

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

ACQIS LLC,  
a Texas limited liability company,

Plaintiff,

v.

SONY INTERACTIVE ENTERTAINMENT  
INC., a Japanese corporation  
SONY INTERACTIVE ENTERTAINMENT  
LLC, a California limited liability company.

Defendants.

Civil Action No. 6:22-cv-386-ADA-DTG

**JURY TRIAL DEMANDED**

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**DECLARATION OF ABRAN J. KEAN IN SUPPORT OF DEFENDANTS SONY  
INTERACTIVE ENTERTAINMENT INC. AND SONY INTERACTIVE  
ENTERTAINMENT LLC'S REPLY IN SUPPORT OF  
PARTIAL 12(B)(6) MOTION TO DISMISS**

I, Abran J. Kean, declare as follows:

1. I am an attorney with Erise IP, P.A., counsel of record for Defendants Sony Interactive Entertainment Inc. and Sony Interactive Entertainment LLC ("Sony") in the above-captioned matter. I submit this declaration based on personal knowledge following a reasonable investigation. If called upon as a witness, I could competently testify to the truth of each statement herein.

2. Attached as **Exhibit 13** is a true and correct copy of this Court's December 28th, 2022 Order in the ASUSTeK/Wiwynn litigation, 6-20-CV-00966, 6-20-CV-00968 memorializing the decisions from the December 19, 2022 claim construction hearing in those proceedings.

3. Attached as **Exhibit 14** is a true and correct copy of the IPR hearing transcript held on December 8, 2015 in EMC Corp. v. ACQIS, LLC, IPR2014-01462, Paper No. 60 and EMC

Corp. v. ACQIS, LLC, IPR2014-01469, Paper No. 55; also filed in *ACQIS LLC v. Samsung Electronics Co., Ltd., et al.*, 2:20-cv-00295, Dkt. No. 69-17 (Exhibit Q).

4. Attached as **Exhibit 15** is a true and correct copy of EMC Corporation's Opening Claim Construction Brief filed on January 20, 2017, in *ACQIS, LLC v. EMC Corporation*, C.A. No. 1:14-cv-13560-ADB (D. Mass.).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 10th day of January 2023 in Greenwood Village, Colorado.

DATED: January 10, 2023

/s/ Abran J. Kean  
Abran J. Kean (*pro hac*)